

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In Re: New York City Policing During Summer 2020  
Demonstrations

20 Civ. 8924 (CM)(GWG)

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This filing is related to:

21 Civ. 02548 (CM)(GWG)

KAYLA ROLON, COREY GILZEAN, MICHAEL  
HERNANDEZ, CHRISTOPHER HUSARY, KEITH  
CLINGMAN, and JONATHAN PECK,

Plaintiffs,

-against-

THE CITY OF NEW YORK, THE NEW YORK POLICE  
DEPARTMENT, MAYOR BILL DE BLASIO, NYPD  
COMMISSIONER DERMOT SHEA, NYPD CHIEF  
TERENCE MONAHAN, AND POLICE OFFICERS  
WELLS, LARS FRANTZEN (TAX ID. 936615), FIERRO  
(SHIELD NO. 88189), JON BRODIE (88<sup>TH</sup> PRECINCT),  
PICHARDO (40<sup>TH</sup> PRECINCT), EDUARD LUCERO,  
ALTAMIRANO (TAX ID 960157), SGT. ROBERT  
DIXSON (TAX ID. 934784), SGT SCOTT HALDEMAN,  
AND JOHN AND JANE DOES 1-20, individually and in  
their official capacities,

Defendants.

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**STIPULATION**

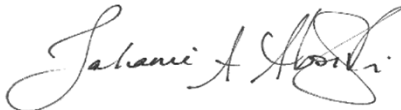
Pursuant to Federal Rule of Civil Procedure 26(d)(1), Plaintiffs Kayla Rolon, Corey Gilzean, Michael Hernandez, Christopher Husary, Keith Clingman, Jonathan Peck and Defendants agree that Plaintiffs, Defendants may immediately seek and serve discovery, including third-party discovery, relating to the claims, defenses, and issues in *Rolon et al. v. City of New York*, civil action 21 Civ. 02548 (CM)(GWG). The parties further agree that:

1. All parties will abide by the Stipulation and Order Regarding Clawback Agreement entered as Docket 333 in civil action 20 Civ. 8924(CM)(GWG) in this matter;
2. All parties will abide by the protective order entered as Docket 115 in civil action 20 Civ. 8924 (CM)(GWG) in this matter; and


3. All discovery that has been and will be conducted in the consolidated cases will be deemed part of *Rolon*, without the need for either party to re-disclose it, respecting any confidentiality designations that are in place.
4. All consolidated and/or joint discovery served by the consolidated cases prior to the lifting of the stay of the *Rolon* matter will be deemed served by *Rolon* without the need for *Rolon Plaintiffs* to re-serve them, with the exception of interrogatories and without prejudice to serve additional discovery.

Dated: New York, New York  
August 09, 2022

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By:   
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By:   
Amy Robinson  
*Senior Counsel*

SO ORDERED:

  
GABRIEL W. CORENSTEIN  
United States Magistrate Judge

August 9, 2022